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***Attorneys for Defendants/Counterclaim
 Plaintiffs BrandTotal, Ltd. and Unimania,
 Inc.***

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO/OAKLAND DIVISION**

FACEBOOK, INC., a Delaware
 corporation,

Plaintiff,

v.

BRANDTOTAL, LTD., an Israeli
 corporation, and
 UNIMANIA, INC., a Delaware
 corporation,

Defendants.

Case No.: 3:20-CV-07182-JCS

**DECLARATION OF RUDOLPH A.
 TELSCHER, JR. IN SUPPORT OF
 ADMINISTRATIVE MOTION TO FILE
 REPLY UNDER SEAL**

Judge: The Hon. Joseph C. Spero
 Ctrm.: Courtroom F – 15th Floor
 Date: October 26, 2020
 Time: 2:00 PM

1 I, Rudolph A. Telscher, Jr., state as follows:

2 1. I am an attorney duly licensed to practice law in the State of Missouri. I am a
3 partner with the law firm of Husch Blackwell LLP, counsel for Defendants/Counterclaim Plaintiffs
4 BrandTotal Ltd. and Unimania, Inc. (collectively, “BrandTotal”), admitted pro hac vice in the
5 above-styled litigation. My testimony in this declaration is based on personal knowledge,
6 information, and belief regarding this litigation, and if called as a witness, I could and would
7 competently testify thereto.

8 2. BrandTotal seeks leave from the Court to file its Reply Brief in Support of its *Ex*
9 *Parte* Motion for Temporary Restraining Order (“Reply”), the supporting Supplemental
10 Declaration of Alon Leibovich, and Exhibit P under seal.

11 3. Good cause exists to seal BrandTotal’s Reply, as it contains references to sensitive
12 financial and customer identification information, including references to the names of
13 BrandTotal’s customers, which if made public, would adversely impact both BrandTotal *and* its
14 customer base. Because this is a motion for temporary restraining order, the law requires
15 Defendant BrandTotal to explain the irreparable harm it is experiencing in specific detail, which
16 necessary involves highly sensitive information.

17 4. Good cause exists to seal the Declaration of Alon Leibovich, along with the
18 accompanying Exhibit P, in support of BrandTotal’s Reply. This Declaration and Exhibit P
19 contains references to sensitive customer identification information, including references to the
20 names of BrandTotal’s customers, which if made public, would adversely impact both BrandTotal
21 *and* its customer base.

22 5. A narrowly tailored proposed order is submitted contemporaneously herewith,
23 pursuant to Civil L.R. 79-5(d)(1)(B).

24 6. Redacted versions of the documents sought to be filed under seal, for which
25 BrandTotal is not seeking to seal the document in its entirety, are being filed contemporaneously
26 herewith, pursuant to Civil L.R. 79-5(d)(1)(C).

27 7. Unredacted versions of the documents sought to be filed under seal with
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1 highlighting to indicate the portions of the document that have been omitted from the redacted
2 version are being filed contemporaneously herewith, pursuant to Civil L.R. 79-5(d)(1)(D).

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4 * * *

5 I hereby declare under penalty of perjury that the above statements are true to the best of
6 my knowledge.

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8 Executed this 22nd day of October 2020 in St. Louis, Missouri.

9 /s/ Rudolph A. Telscher, Jr.

10 Rudolph A. Telscher, Jr.
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